

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PAULA PAGONAKIS,)	
)	
Plaintiff,)	
)	
v.)	NO. 1:06-CV-00027 (SLR)
)	
EXPRESS LLC a/k/a)	
LIMITED BRANDS, INC.,)	
)	
Defendant.)	

STIPULATION REGARDING DISPOSITIVE MOTIONS

1. Pursuant to Local Rule 7.1.2(B), Plaintiff Paula Pagonakis (“Plaintiff”) and Defendant Express LLC (“Defendant”) (collectively referred to hereinafter as the “Parties”) hereby agree and stipulate, subject to the Court’s approval, to submit memoranda of points and authorities in support of summary judgment (and in opposition thereto) in place of briefs.

2. Pursuant to Local Rule 7.1.2(B), the parties further agree and stipulate, subject to the Court’s approval, to the following briefing schedule:

a. Memoranda in Support of Summary Judgment: **May 2, 2007** (as previously agreed to by the parties and ordered by the Court).

b. Opposition Memoranda: **May 23, 2007**.

c. Reply Memoranda: **June 6, 2007**.

3. In support of this agreement and stipulation, the parties note that no date has been set for the pretrial conference in this matter. The parties also note that no date has been set for the trial in this matter.

4. Lead counsel for both Plaintiff and Defendant certify that a copy of this request has been provided to their clients.

Of counsel:

David A. Campbell (#0066494)

Admitted pro hac vice

Lori L. Fauvie (#0076831)

Admitted pro hac vice

VORYS, SATER, SEYMOUR

AND PEASE LLP

2100 One Cleveland Center

1375 East Ninth Street

Cleveland, Ohio 44114

Telephone: 216-479-6100

Fax: 216-479-6060

dacampbell@vssp.com

llfauvie@vssp.com

Of counsel:

James C. Bailey

Admitted pro hac vice

Jason H. Ehrenberg

Admission pro hac vice pending

Bailey & Ehrenberg PLLC

1155 Connecticut Avenue NW

Suite 1100

Washington, D.C.

Telephone: 202-787-3869

Fax: 202-318-7071

jcb@becounsel.com

By: /s/ Francis G.X. Pileggi

Francis G.X. Pileggi (I.D. # 2624)

FOX ROTHSCHILD LLP

Citizens Bank Center

919 North Market Street

Suite 1300, 13th Floor

Wilmington, DE 19801-2323

Telephone: 302-655-3667

Fax: 302-656-8920

fpileggi@foxrothschild.com

By: /s/ Gary Aber

Gary Aber (I.D. # 754)

Aber, Goldlust, Baker & Over

702 King Street

P.O., Box 1675

Wilmington, DE 19899

Telephone: 866 -826-4950

Fax: 302-472-4920

gaber@gablawde.com

Hon. Sue L. Robinson